

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

INFOGATION CORPORATION,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No.: 6:20-cv-0366-ADA

Jury Trial Demanded

DECLARATION OF KENT QING PU

I, Kent Qing Pu, hereby declare and state as follows:

1. I am the CEO of Infogation Corporation ("Infogation"). I make this declaration based on my own personal knowledge. If called as a witness, I could and would testify to the facts stated herein.

2. I am a co-inventor of U.S. Patent No. 6,292,743 ("the '743 Patent") along with Dr. Hui Henry Li. Dr. Li left Infogation in 2000 and since that time he has had limited contact with myself and with Infogation.

3. In 2013, Infogation licensed its navigation technology to Hertz Car Rental ("Hertz") as part of Hertz's NeverLost 6 application, which was released in 2014. Infogation provided training in and implementation of its technology in a Hertz (Navigation Solutions LLC) facility in Plano, Texas.

4. The individual primarily responsible for that deal on the Hertz side was Michael Mouser, an expert in GPS technology. Mr. Mouser worked with Hertz through his position with Magellan, which had initially developed NeverLost.

5. Mr. Mouser currently works for Wilson Electronics, which is located in Texas. I believe he could provide testimony concerning Infogation's deal with Hertz, as well as GPS technology generally.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25 day of August, 2020 at Rancho Santa Fe, CA.


Kent Qing Pu